

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FOX NEWS NETWORK, LLC,

Plaintiff,

v.

TVEYES INC.,

Defendant.

Case No. 13-CV-5315 (AKH)

**NOTICE OF MOTION FOR LEAVE TO
FILE BRIEF *AMICI CURIAE***

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the May 28, 2015 Declaration of Brett Max Kaufman, and the proposed brief of *amici curiae* attached thereto as Exhibit 1, media critics Eric Alterman, Brave New Films, Fairness in Accuracy and Reporting (“FAIR”), and Victor Navasky will move this Court for an order granting leave to file a memorandum as *amici curiae*.

Date: May 28, 2015

Corynne McSherry
Kit Walsh
ELECTRONIC FRONTIER FOUNDATION
815 Eddy Street
San Francisco, California 94109
T: 415.436.9333 x122
F: 415.436.9993
corynne@eff.org

Respectfully submitted,

/s/ Brett Max Kaufman
Brett Max Kaufman
TECHNOLOGY LAW & POLICY CLINIC
N.Y.U. SCHOOL OF LAW
245 Sullivan Street—Furman Hall #511
New York, New York 10012
T: 212.998.6042
F: 212.995.4031
brettmaxkaufman@nyu.edu

Counsel for Proposed Amici Curiae

To: Dale Margaret Cendali
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022

Jessica Anne Rose
QUINN EMANUEL URQUHART & SULLIVAN LLP
51 Madison Avenue—22nd Floor
New York, New York 10010

Elizabeth A. McNamara
DAVIS WRIGHT TREMAINE LLP
1633 Broadway—27th Floor
New York, New York 10019